

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	
)	Cause No. 1:23-cv-00115
\$111,980.00 in United States Currency,)	
)	
Defendant.)	

VERIFIED COMPLAINT IN REM

Plaintiff, United States of America, by its attorneys,
Clifford D. Johnson, United States Attorney for the Northern District of
Indiana, and Madison Lo Dolce, Assistant United States Attorney, brings this
complaint and alleges as follows in accordance with Supplemental Rule G(2)
of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is an action to forfeit and condemn to the use and benefit of
the United States of America, pursuant to 21 U.S.C. § 881(a)(6), United
States currency in the amount \$111,980.00 (hereinafter referred to as
"defendant property"), for violations of 21 U.S.C. § 841.

THE DEFENDANT IN REM

2. Defendant property was seized on November 2, 2021, from Individual¹ in Fort Wayne, Indiana. Defendant property is currently in the custody of the Drug Enforcement Administration in Chicago, Illinois.

JURISDICTION AND VENUE

3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant properties. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has both *in rem* and subject matter jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

5. Venue is proper in this district pursuant to 28 U.S.C. § 1395(b), because the defendant property was found within this district.

BASIS FOR FORFEITURE

6. The defendant property is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6), because it constitutes money furnished or intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act.

¹ Between the time of the November 2, 2021 seizure and the present, Individual has become a confidential informant for the Drug Enforcement Administration. Thus, it is in the best interest of Individual and the ongoing investigation that its identity remain anonymous.

FACTS

7. On November 2, 2021, a law enforcement officer conducted a traffic stop for a traffic violation that occurred near 901 West Coliseum Boulevard, Fort Wayne, Indiana 46808.

8. The vehicle was a rental, driven by Individual's Significant Other (SO). Individual was seated in the front passenger's seat. Law enforcement initiated a traffic stop of the vehicle. A law enforcement officer witnessed Individual throwing something out of the window of the vehicle prior to the stop. After approaching the vehicle, the officer detected a strong odor of marijuana emitting from the vehicle. The officer also employed his K9 to conduct an open-air sniff of the vehicle. The law enforcement officer asked both Individual and SO to step out of the vehicle while he conducted a search.

9. The search revealed a soft black cooler with red handles, resembling a lunchbox, pushed down between the front passenger seat and rear passenger floorboard. Inside the lunchbox was ten bundles of United States currency wrapped with rubber bands in six vacuum sealed plastic bags. The United States currency totaled \$111,980.00.

10. In response to questioning by the law enforcement officer, Individual and SO both denied ownership of the lunchbox and the United States currency found inside.

11. The officer gave Individual and SO one continuity receipt for the lunchbox and money seized and gave SO a verbal warning for the traffic related issue. The traffic stop concluded, but surveillance of Individual continued.²

12. On August 9, 2022, law enforcement conducted a traffic stop on Individual in Fort Wayne, Indiana, prior to conducting a search warrant at Individual's residence.

13. Individual agreed to exit its vehicle and enter the squad car for a recorded interview. Individual stated that it understood its rights and agreed to the interview.

14. During the interview, Individual, *inter alia*, revealed that the \$111,980 seized during the November 2, 2021 traffic stop was the proceeds of drug sales that it was tasked with delivering to another member of a Chicago/Indiana based money laundering Organization.

² For months prior to this traffic stop, surveillance of Individual was conducted by law enforcement due to a tip they received regarding Individual's involvement in a Chicago/Indiana based money laundering Organization.

WHEREFORE, the plaintiff requests that the defendant property be forfeited and condemned to the United States of America; that Warrant of Arrest In Rem be issued for defendant properties; that the plaintiff be awarded its costs and disbursements in this action; and for such other relief this court deems proper and just.

Respectfully submitted,

CLIFFORD D. JOHNSON
UNITED STATES ATTORNEY

By: /S/ Madison Lo Dolce
Madison Lo Dolce
Assistant U.S. Attorney
5400 Federal Plaza, Suite 1500
Hammond, Indiana 46320
(219)937-5515; fax: 219-852-2770
[email:madison.lodolce@usdoj.gov](mailto:madison.lodolce@usdoj.gov)

Verification

I, Darren Compton, hereby verify and declare under penalty of perjury that I am a Task Force Officer with the Drug Enforcement Administration in Fort Wayne, Indiana, that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 7 through 14 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Task Force Officer with the Drug Enforcement Administration.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 3/17/2023

/s/ Darren Compton

Darren Compton

Task Force Officer

Drug Enforcement Administration